REMARKS

This communication is a full and timely response to the non-final Office Action dated November 10, 2008. Claims 1-5, 9-13, 15, 16, and 20-37 remain pending where claims 6-8, 14, and 17-19 were previously canceled. By this communication, claims 1, 9-11, 13, 16, 20, and 22 are amended and claims 23-37 are added. Support for the amended subject matter can be found, for example, in paragraphs [0006], [0055]-[0058], [0071], [0072], [0079], and [0080] of Applicant's disclosure.

On January 27, 2009, the Examiner and Applicant's representative conducted an interview. During the interview, the Examiner explained the reasoning and logic behind the application of *Chasen et al.* (U.S. Patent No. 6,760,721) in rejecting the claims. Although no agreement was reached, Applicant's appreciate the Examiner's candor regarding his interpretation of the pending claims in view of the applied art.

In numbered paragraph 4 on beginning on page 2 of the Office Action, claims 1-5, 9-13, and 20-22 are rejected under 35 U.S.C. §102(e) for alleged anticipation over *Chasen*. Applicant respectfully traverses this rejection.

Applicant's embodiments are directed to a system that includes a database that stores plural words, which are hierarchically arranged into various levels based on a common language structure and common root features. The common language structure is based on the sentence structure generally found in prose. This sentence structure typically has "a noun (subject) followed by a verb that is followed by another noun (object) ." A more complicated sentence structure can include strategically placed adverbs, adjectives, and pronouns, such as "a man (subject) quickly (adverb) eats (verb) a big (adjective) fish (object)." This sentence structure is universal across human languages. The exemplary embodiments provided in

Applicant's is capable of predicting or otherwise providing candidate words for

selection. The selection of a current candidate word follows an earlier selected word

in the process of forming a sentence. The system achieves this functionality by

advancing through at least one level of words in the database hierarchy based on a

sequence of keystrokes input by a user. The words stored in the database can be

displayed in the first window as the system advances through the database

hierarchy. The system displays the words as plural lines of text that represent the

relationship between a candidate word and a respective category provided in the

database. One of the lines of text in the first window is selected based on the

candidate word. The selected line of text is displayed in a second window. The

candidate words of each selected line of text are arranged into a sentence.

Applicant's claims broadly encompass the foregoing features. For example,

claim 1 recites the following:

> A method of inputting text into a data processing
> apparatus, including the steps of:
> a. providing a database of words that are arranged
> hierarchically into plural categories based on a common
> characteristic, each category having a plurality of levels;
> b. advancing through the word hierarchy based on a
> sequence of keystrokes input by a user, the sequence of
> keystrokes being used to select a candidate word from the
> database;
> c. displaying, in a first window, plural lines of text
> associated with the sequence of keystrokes, wherein each line of
> text represents a relationship between the candidate word and a
> respective category provided in the database as the user
> advances through the hierarchy;
> d. iteratively selecting a line of text from said plural lines
> of text shown in said first window based on the candidate word;
> e. displaying said selected lines of text in a second
> window; and
> f. arranging the candidate words of each selected line of
> text into a sentence.

Claim 13 recites:

> A computer-readable medium containing a computer
> program configured and executable, when installed in a data
> processing apparatus, to

        (a) provide in said data processing apparatus a
database of words that are arranged hierarchically into plural
categories based on a common characteristic, each category
having a plurality of levels,

        (b) advance through the word hierarchy based on
keystrokes input by a user, the input keystrokes being used to
select a candidate word from the database,

        (c) display, in a first window, plural lines of text, each line
of text representing a relationship between the candidate word
and a respective category provided in the database as the user
advances through the word hierarchy,

        (d) iteratively select a line of text from said plural lines of
text displayed in said first window based on the candidate word;

        (e) display said selected lines of text in a second
window; and

        (f) arrange the candidate words of each selected line of
text into a sentence.

Chasen fails to disclose the each and every feature and/or the combination of
features recited in Applicant's claims.

As discussed in a previous response, *Chasen* discloses a system that collects
metadata from various sources. The collected data is organized and displayed in a
user interface as a hierarchical tree. The user interface includes a tree window and
a table window. The tree window provides various ways to group and categorize
audio data using leaf and non-leaf nodes. When the user selects a node, the table
window displays information associated with the node. For example, if the selected
node is a leaf node, the node table displays audio tracks that fall within the selected
grouping. On the other hand, if the selected node is a non-leaf node, the node table
displays collective information about the tracks within the sub-groupings of the
selected grouping (col. 7, lines 43-62; col. 8, line 28 through col. 9, line 23).

Chasen, however, fails to disclose or suggest the combination of features
recited in independent claims 1 and 13. Particularly, the applied reference does not
appear to contemplate,

        displaying, in said first window, plural lines of text
associated with the sequence of keystrokes, wherein each line of
text represents a relationship between a candidate word and a

respective category provided in the database as the user
advances through the hierarchy;
   selecting a line of text from said plural lines of text
shown in said first window as one of the topic or the topic
descriptor based on the candidate word;
   displaying said selected lines of text in a second window;
and
   arranging the candidate words of each selected line of
text into a sentence.

In brief, Applicant's claims display a line of text that shows a relationship between a candidate word and respective category in the database, lines of text are iteratively selected based on the candidate word, and the candidate words of each selected line of text into a sentence.

In contrast, *Chasen* discloses that if a selected node is a leaf node, the node table displays audio tracks that fall within the selected grouping, and if the selected node is a non-leaf node, the node table displays collective information about the tracks within the sub-groupings of the selected grouping. There is no disclosure or suggestion that the selected nodes contain candidate words and that the candidate words of each selected node are arranged into a sentence. In fact, because *Chasen* appears to be directed to the organization, selection, and playback of music files, Applicant's respectfully submit that this reference is incapable of achieving Applicant's claimed results, such as arranging candidate words of each selected line of text into a sentence. For at least these reasons, *Chasen* fails to anticipate Applicant's claims.

To properly anticipate a claim, the document must disclose, explicitly or implicitly, each and every feature recited in the claim. *See* <u>Verdegall Bros. v. Union Oil Co. of Calif.</u>, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Based on the foregoing discussion, Applicant requests that the rejection of independent claims 1 and 13 and their corresponding depending claims be withdrawn.

In numbered paragraph 7, claim 16 stands rejected under 35 U.S.C. §103(a) for alleged unpatentability over *Chasen* in view of *Pfaffenberger et al* (Microsoft Windows and the Internet, (1999)). Applicant respectfully traverses this rejection.

Pfaffenberger is applied in an effort to remedy the acknowledged deficiencies of *Chasen* concerning the features recited in claim 16. While Applicant does not acquiesce to the PTO's interpretation of *Pfaffenberger*, Applicant respectfully submits that this reference fails to remedy the deficiencies of *Chasen* discussed above with respect to claims 1 and 13. Because claim 16 depends from claim 1, this claim is allowable by virtue of at least its dependency. Hence, withdrawal of this rejection is respectfully requested.

Claims 23-37 are newly added. Applicant respectfully submits that the applied references fail to disclose or suggest the combination of features recited therein. Accordingly, favorable consideration and allowance of these claims is respectfully requested.

Conclusion

Based on the foregoing amendments and remarks, Applicant respectfully submits that claims 1-5, 9-13, and 15-37 are allowable and this application is in condition for allowance. In the event any issues remain, the PTO is invited to contact the undersigned representative.

Respectfully submitted,

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